



December 19, 2019

VIA ECF

Magistrate Judge Stewart D. Aaron
500 Pearl Street, Room 1970
New York, NY 10007

**Re: Lizzette Vega-Ruiz v. Montefiore Medical Center
Case No. 1:17-cv-01804-LTS-SDA**

Dear Judge Aaron,

On behalf of Plaintiff, we wish to file documents under seal. In compliance with the Court's Individual Rules of Practice (Rule III. E.), Plaintiff provided Defendant and the Court with unredacted copies of all documents. Plaintiff also filed a redacted copy of her brief and any documents, "from which the material claimed to require confidential treatment has been removed or concealed." "[N]otwithstanding the strong presumption of public access to 'judicial documents' under the First Amendment and the common law," (Rule III. E.) (citing *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119–21 (2d Cir. 2006)), the Parties—with a magistrate judge's approval—entered a protective order. (ECF No. 22.) Exhibits 3 through 6, along with related portions of the brief, fall within this protective order.

For these reasons, Plaintiff respectfully requests that the Court allow her to file under seal an unredacted version of her brief and Exhibits 3 through 6, which accompany Plaintiff's Motion for Judgment as a Matter of Law or in the Alternative a New Trial DE#95.

Dated: December 19, 2019

Respectfully submitted,

Motion DENIED WITHOUT PREJUDICE. Counsel has not given the Court any reason why these exhibits should be sealed. No later than March 24, 2020, counsel shall file a renewed motion to seal, specifically pointing to the applicable provisions of the protective order and addressing, with citations to authority, why these documents should be sealed after being entered into the public record at trial, especially where documents marked as unsealed exhibits during trial are part of the "judicial record subject to public inspection." *Pelosi v. Spota*, 607 F. Supp. 2d 366, 377 (E.D.N.Y. 2009) (Bianco, J.). In the alternative, if Plaintiff wishes to withdraw her motion to seal she shall file unredacted copies of her motion papers and exhibits no later than March 24, 2020.

SO ORDERED.

Dated: March 17, 2020

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